

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**WILMINGTON SAVINGS FUND
SOCIETY, FSB, D/B/A CHRISTIANA
TRUST, NOT INDIVIDUALLY BUT
AS TRUSTEE FOR PRETIUM
MORTGAGE ACQUISITION
TRUST,**

Plaintiff,

V.

LEEROY M. MYERS; BARBARA MYERS,

Defendants.

CIVIL ACTION NO. 4:22-cv-00088

DECLARATION OF RAMONA V. LADWIG

1. I, Ramona Ladwig, am over the age of 21 years, and am of sound mind capable of making this Declaration, and am fully competent to testify to the matters stated herein. The facts stated in this Declaration are true and of my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth below.

2. I am an employee of the law firm of McCarthy & Holthus, LLP (“MH”), who represents plaintiff Wilmington Savings Fund Society, FSB (“Plaintiff”) in this matter as foreclosure counsel. I am one of the custodian of records of MH and am familiar with the manner in which its records are created and maintained by virtue of my duties and responsibilities. Attached to this declaration are records from MH and the information contained herein is obtained from records kept by MH in the regular course of business. It is the regular practice of

the business to make such records and for an employee or representative of MH with personal knowledge of the act, event, condition, opinion, or diagnosis set forth in the records to make these records or to transmit the information to be included in such records. The records were made at or near the time or reasonably soon after the event, condition, opinion, or diagnosis set forth in the records. The records attached hereto are the original records or exact duplicates of the original records.

3. Defendants Leeroy M. Myers and Barbara C. Myers (“Defendants”) were served a copy of the notice of summons and complaint in this matter via first-class mail to Defendants’ last known address on May 10, 2022, pursuant to Rule 5(b)(2)(C) of the Federal Rule of Civil Procedure. Attached as **Exhibit A** is a true and correct copy of the May 10, 2022 First-Class Mailing of the Notice of Summons and Complaint.

4. Defendants received the mailing of the notice of summons and complaint sent on May 10, 2022 via first-class mail. Attached as **Exhibit B** are highlighted portions of letters received from Defendants’ attorney, Mr. Ira D. Joffe, referencing Defendants’ receipt of the summons and complaint sent via first-class mail on May 10, 2022.

5. Defendants were thus properly served in this action, pursuant to Rule 5(b)(2)(C) on May 10, 2022.

I declare under penalty of perjury under the laws of the United States of America and the State of Texas that the foregoing is true and correct.

Dated: July 8, 2022.

/s/ Ramona Ladwig
Ramona Ladwig
McCarthy & Holthus, LLP